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Martin J. Bordson

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Bravo Company USA, Inc., a Wisconsin
corporation,

Plaintiff,

vs.

Martin J. Bordson, an individual,

Defendant.

Case No. 2:14-cv-00387-RCJ-GWF

**STIPULATION TO AMEND
SCHEDULING ORDER**

(First Request)

Bravo Company USA, Inc. ("Plaintiff") and Defendant Martin J. Bordson ("Defendant")
(together, the "Parties"), submit the following:

1 1. Rule 16.1-3 of the Local Rules of Practice for Patent Cases before the United States
2 District Court for the District of Nevada (the “Local Patent Rules”) provides for the submission of
3 proposed modifications to the obligations and deadlines imposed by the Court’s Local Patent
4 Rules.

5 2. On June 17, 2015, the Court entered the Parties’ Renewed Discovery Plan and
6 Scheduling Order (Doc. 54) (the “Scheduling Order”).

7 3. The Scheduling Order set forth the following dates and deadlines:

Event	Deadline
Initial Rule 26(a)(1)(A) Disclosures	June 25, 2015
Plaintiff’s LR 16.1-11/16.1-8 Non-Infringement, Invalidity, and Unenforceability Contentions and LR 16.1-9 document production	60 days after issuance of Discovery Plan and Scheduling Order August 16, 2015
Defendant’s LR 16.1-11 responses to Plaintiff’s initial Non-Infringement, Invalidity, and Unenforceability Contentions, LR 16.1-6 Disclosure of Asserted Claims and Infringement Contentions, and LR 16.1-7 document production	90 days from service of Plaintiff’s LR 16.1-11/16.1-8 Non-Infringement, Invalidity, and Unenforceability Contentions and LR 16.1-9 document production November 14, 2015
Pre-Claim Construction Settlement Conference	30 days after submission of all disclosures and responses required under LR 16.1-6 through 16.1-12 December 14, 2015
Exchange of Proposed Terms for Construction	180 days after issuance of Discovery Plan and Scheduling Order December 14, 2015
Exchange of Preliminary Claim Constructions and Supporting Extrinsic Evidence	30 days after exchange of Proposed Terms for Construction January 13, 2016
Joint Claim Construction and Prehearing Statement	45 days after exchange of Proposed Terms for Construction January 28, 2016

Parties Submit <i>Markman</i> Tutorials	15 days after filing of Joint Claim Construction and Prehearing Statement February 12, 2016
Opening Claim Construction Briefs from all Parties	30 days after filing of Joint Claim Construction and Prehearing Statement February 27, 2016
Responsive Claim Construction Briefs from all Parties	14 days after filing of Opening Claim Construction Briefs March 12, 2016
Reply Claim Construction Briefing	7 days after filing of Responsive Claim Construction Briefs March 19, 2016
Claim Construction Hearing	Court's convenience
Entry of <i>Markman</i> order	Court's convenience
Post-Claim Construction Settlement Conference	30 days after entry of <i>Markman</i> Order
Initial expert disclosures	60 days after entry of <i>Markman</i> Order
Rebuttal expert disclosures	30 days after entry of <i>Markman</i> Order
Completion of Expert Discovery	15 days after service of rebuttal expert reports
Dispositive Motions	45 days after expert discovery
Amending the Pleadings and Adding Parties	90 days before close of discovery
Pre-Trial Order	30 days after decision on last pending dispositive motion
Pre-trial Settlement Conference	30 days after filing of the Pre-Trial Order

4. The Parties wish to extend the remaining deadlines by 12 days as follows:

Event	Deadline
Joint Claim Construction and Prehearing Statement	February 9, 2016
Parties Submit <i>Markman</i> Tutorials	15 days after filing of Joint Claim Construction and Prehearing Statement February 24, 2016
Opening Claim Construction Briefs from all Parties	30 days after filing of Joint Claim Construction and Prehearing Statement

	March 10, 2016
Responsive Claim Construction Briefs from all Parties	14 days after filing of Opening Claim Construction Briefs
	March 24, 2016
Reply Claim Construction Briefing	7 days after filing of Responsive Claim Construction Briefs
	March 31, 2016
Claim Construction Hearing	Court's convenience
Entry of <i>Markman</i> order	Court's convenience
Post-Claim Construction Settlement Conference	30 days after entry of <i>Markman</i> Order
Initial expert disclosures	60 days after entry of <i>Markman</i> Order
Rebuttal expert disclosures	30 days after entry of <i>Markman</i> Order
Completion of Expert Discovery	15 days after service of rebuttal expert reports
Dispositive Motions	45 days after expert discovery
Amending the Pleadings and Adding Parties	90 days before close of discovery
Pre-Trial Order	30 days after decision on last pending dispositive motion
Pre-trial Settlement Conference	30 days after filing of the Pre-Trial Order

5. Good cause exists for the requested extension because the parties are continuing to engage in the meet and confer process as it pertains to the stipulated construction of certain terms. The parties have already agreed that the construction of five identified terms is not required and are hopeful that they may reduce the number of terms requiring construction even further thereby greatly simplifying the requisite briefing by and between the parties and the resources that might otherwise be required of the Court.

IT IS SO AGREED AND STIPULATED:

Dated: January 28, 2016

Respectfully submitted,

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Attorneys or Defendant
Martin J. Bordson

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: January 29, 2016